

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
(Eastern Division)**

KPM ANALYTICS NORTH AMERICA)
CORPORATION,)
)
Plaintiff,) Civil Action No. 4:21-cv-10572-TSH
)
v.)
BLUE SUN SCIENTIFIC, LLC; THE)
INNOVATIVE TECHNOLOGIES GROUP & CO.,)
LTD; ARNOLD EILERT; MICHELLE GAJEWSKI;)
ROBERT GAJEWSKI; RACHAEL GLENISTER;)
GREGORY ISRAELSON; IRVIN LUCAS; and)
PHILIP OSSOWSKI,)
)
Defendants.)
)

**DEFENDANT THE INNOVATIVE TECHNOLOGIES GROUP & CO., LTD'S
ASSENTED TO MOTION TO IMPOUND AND FOR LEAVE TO FILE MOTION FOR
SUMMARY JUDGMENT AND REQUEST FOR HEARING UNDER SEAL**

Defendant The Innovative Technologies Group & Co. ("ITG") hereby files this Assented to Motion to Seal ITG's Motion for Summary Judgment and Request for Hearing, and in support states:

1. ITG intends to file a Motion for Summary Judgment and Request for Hearing on August 19, 2022 in accordance with the Court's scheduling orders in this case. ITG intends to include information in both the supporting legal memorandum and as attachments material that has been designated by the parties as Confidential and High Confidential Attorneys' Eyes Only pursuant to the Stipulated Protective Order in this case (ECF No. 59).

2. The Stipulated Protective Order in this matter provides that "Without written permission from the Designating Party or a court order secured after appropriate notice to all interested persons, a Party may not file in the public record in this action any Protected Material

but may file Protected Material under seal in accordance with the rules of the Court.” Protected Material includes material designated confidential and highly confidential.

3. No party has agreed to remove the confidential and highly confidential designations for material that ITG intends to include and reference in its motion.

4. ITG has conferred with counsel for Plaintiffs, who has assented to the relief requested in this motion

WHEREFORE, The Innovative Technologies Group & Co. hereby request that this Court allow the Entity Defendants to file under seal their Motion for Summary Judgment and Request for Hearing in this case.

Dated: August 18, 2022

THE INNOVATIVE TECHNOLOGIES GROUP & CO., LTD.

/s/ Maria T. Davis

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CERTIFICATE OF SERVICE

I hereby certify that, on August 18th, 2022, this document was sent electronically to the registered participants as identified on the Notice of Electronic Filing. Paper copies will be sent to those indicated as non-registered participants.

/s/ George F. Ritchie

George F. Ritchie